

ROBERT FOX, ESQ.  
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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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CELESTINO PACHECO LOPEZ,

Plaintiff,

Case No. 14-CV-4443 (PKC)

NOTICE OF MOTION

MOHAMMED MOHAMMED, KIRSTEN  
GOLDBERG, EL-RAWSHEH CAFÉ &  
RESTAURANT, INC., EL-RAWSHEH  
CAFÉ, INC., EL RAWSHEH CUISINE, INC., d/b/a  
EL-RAWSHEH,

Defendants.

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PLEASE TAKE NOTICE that upon the annexed Affidavits of George Fanous, Mohammed Mohammed and Ihab Ilbana, and the annexed Affirmation of Susan Adler and upon all the papers heretofore had herein, Defendants Mohammed Mohammed, El-Rawsheh Café & Restaurant, Inc., El-Rawsheh Café, Inc., and El Rawsheh Cuisine, Inc. d/b/a El-Rawsheh will move this Court before the Hon. Pamela K. Chen, U.S.D.J., in room \_\_\_\_\_, United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, on the \_\_\_\_\_ day of \_\_\_\_\_, 2015 at \_\_\_\_\_ Am/PM or as soon thereafter as counsel can be heard for an Order pursuant to Federal Rule of Civil Procedure 60(b) vacating the default judgment entered in this case on November 24, 2014 and for such other relief as the Court deems appropriate.

Dated: New York, New York  
February 18, 2015

s/ Robert Fox

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ROBERT FOX, ESQ.

Attorney for Mohammed Mohammed, El-  
Rawsheh Café & Restaurant, Inc., El-  
Rawsheh Café, Inc., El Rawsheh Cuisine,  
Inc. d/b/a El-Rawsheh herein

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